

1
2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

3 -----X
4 Estate of VALERIE YOUNG, by VIOLA YOUNG,
5 as Administratrix of the Estate of
Valerie Young, and in her personal
6 capacity, SIDNEY YOUNG, and LORETTA
YOUNG LEE,

Plaintiffs,

7 vs.

Index No.:
07CV6241

8 STATE OF NEW YORK OFFICE OF MENTAL
9 RETARDATION AND DEVELOPMENTAL
DISABILITIES, PETER USCHAKOW,
10 personally and in his official
capacity, JAN WILLIAMSON, personally
11 and in her official capacity, SURESH
12 ARYA, personally and in his official
capacity, KATHLEEN FERDINAND,
13 personally and in her official
capacity, GLORIA HAYES, personally and
14 in her official capacity, DR. MILOS,
personally and in his official capacity,

Defendants.

15 -----X
16 April 10, 2008
17 10:09 a.m.

18 Examination before trial of JAN
19 WILLIAMSON, held at the offices of The
20 Catafago Law Firm, P.C., 350 Fifth
21 Avenue, New York, New York, pursuant to
22 Notice, before Wendy D. Boskind, a
23 Registered Professional Reporter and
24 Notary Public of the State of New York.
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Office of Mental Retardation

and Developmental Disabilities

1 Williamson

2 Q. Well, in connection with
3 these official findings, the first page
4 of this document, CQC 1, the State agency
5 writes, in its official findings, quote:
6 "The documentation that I reviewed
7 provided little information as to Ms.
8 Young's actual level of activity". My
9 question to you, ma'am, is do you know if
10 that was -- there was, in fact, any
11 documentation indicating any level of
12 physical activity for Valerie during the
13 time period from the three months prior
14 to her death until her death.

15 A. I am not aware.

16 Q. Incidentally, what is a "core
17 log"?

18 A. Every residential unit has
19 what's called a "core office", it's the
20 supervisor's office, and they maintain a
21 logbook for each shift of the -- unusual
22 occurrences, let's say, that take place
23 during the course of the shift, so the
24 "core log" will record things that are
25 reported to them for their entire unit

1 Williamson

2 for that shift.

3 Q. Only something that would be
4 unusual would be reported?

5 A. Generally, something unusual,
6 untoward, staffing issues, if somebody
7 was sent out to the hospital.

8 Q. Okay.

9 A. It's used as a communication
10 book from shift to shift.

11 Q. If someone was acting out?

12 A. Could be, depends on the
13 level of the behavioral episode.

14 Q. The different levels you
15 have, reportable and you have minor
16 occurrences. Is something that's less
17 than a minor occurrence something that
18 still should be in the logbook?

19 A. Minor occurrences may not
20 even be in the logbook, but something
21 that would be a reportable or serious
22 reportable should be making its way into
23 that core log.

24 Q. Okay. In the official State
25 finding, it continues: "Although the